

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC d/b/a FAIRHILLS CAPITAL

Defendants,

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

Case No. 7:12-cv-06421-KMK

**UNOPPOSED MOTION FOR LEAVE TO WITHDRAW ATTORNEY APPEARANCE
FOR DEFENDANT EDWARD BRONSON**

Defendant, EDWARD BRONSON (“Mr. Bronson”), by and through his undersigned counsel and pursuant to Local Civil Rule 1.4, respectfully seeks to withdraw the appearance of attorney Ryan D. O’Quinn, Esq. of the law firm DLA Piper LLP (US). In support of this motion, Defendant states as follows:

1. Ryan O’Quinn, Esq. has accepted an executive position with a private business enterprise and has announced an intention to withdraw from DLA Piper, LLP (US) effective in July 2022. *See* Declaration of Ryan O’Quinn, attached hereto as Exhibit A.

2. In accordance with Local Civil Rule 1.4, Mr. Bronson has been notified and has consented to Mr. O’Quinn’s withdrawal from this District Court proceeding.

3. Mr. Bronson will continue to be represented by counsel of record, Paul A. Rachmuth, whose contact information is:

Paul A. Rachmuth (pr1566)
66 North Village Avenue
Rockville Centre, NY 11570
Tel: (516) 330-0170
Email: paul@rachmuth.com

4. Mr. O'Quinn's withdrawal will not prejudice any party, delay this matter, or otherwise affect any current deadlines in this District Court proceeding.

5. Undersigned counsel certifies that he has conferred with opposing counsel, Maureen P. King, regarding the requested relief and opposing counsel does not take a position on Mr. O'Quinn's motion to withdraw from this District Court proceeding.

WHEREFORE, Mr. Bronson, by and through undersigned counsel, respectfully requests that the Court grant this motion and enter an Order withdrawing the appearance of Ryan D. O'Quinn from this matter, direct the Clerk of Court to remove Mr. O'Quinn from all service lists, and grant all other relief the Court deems just and proper.

Dated: June 16, 2022

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Ryan D. O'Quinn

Ryan D. O'Quinn (FBN: 513857)
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305.423.8500 (t)

SO ORDERED

KENNETH M. KARAS U.S.D.J.

6/24/22

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 16, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or plaintiff either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Ryan D. O'Quinn

Ryan D. O'Quinn